

1 TRACY L. WILKISON  
Acting United States Attorney  
2 SCOTT M. GARRINGER  
Assistant United States Attorney  
3 Chief, Criminal Division  
4 JONATHAN S. GALATZAN  
Assistant United States Attorney  
5 Chief, Asset Forfeiture Section  
6 JAMES E. DOCHTERMAN (Cal. Bar No. 256396)  
Assistant United States Attorney  
7 Asset Forfeiture Section  
Federal Courthouse, 14th Floor  
8 312 North Spring Street  
Los Angeles, California 90012  
9 Telephone: (213) 894-2686  
10 Facsimile: (213) 894-0142  
E-mail: [James.Dochterman@usdoj.gov](mailto:James.Dochterman@usdoj.gov)

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT  
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION  
16

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.  
20

21 APPROXIMATELY \$107,539,422.29  
22 IN FUNDS AND SECURITIES,

23 Defendant.  
24

25 THE ASSETS MANAGEMENT  
26 IRREVOCABLE TRUST – CO, BY  
AND THROUGH ITS TRUSTEE  
27

NO. CV 18-3855 DMG (Ex)

**PLAINTIFF'S STATUS REPORT  
PURSUANT TO JULY 15, 2019  
COURT ORDER**

1 BRIDGFORD TRUST COMPANY,  
2 LLC; THE ASSETS MANAGEMENT  
3 IRREVOCABLE TRUST – JO, BY  
4 AND THROUGH ITS TRUSTEE  
5 BRIDGFORD TRUST COMPANY,  
6 LLC; THE ASSETS MANAGEMENT  
7 IRREVOCABLE TRUST – MO, BY  
8 AND THROUGH ITS TRUSTEE  
9 BRIDGFORD TRUST COMPANY,  
10 LLC; PROPERTY CARE  
11 INSURANCE COMPANY, INC.;  
12 AND SURGERY CENTER  
MANAGEMENT, LLC.

Claimants.

13 Pursuant to this Court’s July 15, 2019 Order (ECF 36), Plaintiff United  
14 States of America (the “government”) submits this seventh status report.

15 While Julian Omid, who is not a claimant here, has presented collateral  
16 procedural and substantive challenges to this action in the context of the related  
17 criminal prosecution (*United States v. Omid, et al.*), no party to this action has  
18 given any indication to the government that it believes the stay in this matter  
19 should be lifted or that the action should not remain stayed for all purposes  
20 pending the resolution of the related criminal action.

21 During June and July 2021, the Court denied Julian Omid’s motions  
22 seeking distribution of seized property for criminal defense expenses and dismissal  
23 of the instant civil action on timeliness grounds (Criminal ECF 1084), denying as  
24 well his motions for reconsideration (Criminal ECF 1145).

25 During August 2021, claimant Surgery Center Management LLC (“SCM”)  
26 (which is also a defendant in *Omid*) filed various unsuccessful motions in the  
27 criminal case seeking to have the government turn over to SCM a portion of the

1 seized assets to pay anticipated fees and costs to defend itself in the criminal case  
2 (styled as a “Motion for Return of Property for Attorneys’ Fees”). Also in August  
3 and September 2021, both SCM and Julian Omidì filed unsuccessful motions to  
4 dismiss the criminal action and to suppress evidence.

5 The criminal trial began September 23, 2021 and is pending as of the date of  
6 this status report. The next status report will be filed on or before February 4,  
7 2021.

8 DATED: October 8, 2021

Respectfully submitted,

9 TRACY L. WILKISON  
10 Acting United States Attorney  
11 SCOTT M. GARRINGER  
12 Assistant United States Attorney  
13 Chief, Criminal Division  
14 JONATHAN S. GALATZAN  
15 Assistant United States Attorney  
16 Chief, Asset Forfeiture Section

17 /s/ James E. Dochterman  
18 JAMES E. DOCHTERMAN

19 Assistant United States Attorney

20 Attorneys for  
21 United States of America  
22  
23  
24  
25  
26  
27